

April 14, 2005

The Honorable Kent A. Jordan
United States District Court
844 King Street
Wilmington, DE 19801

VIA ELECTRONIC FILING

Re: *Wayne Van Scoy v. Van Scoy Diamond Mine of Delaware, et al.*,
C.A. No. 05-108-KAJ

Dear Judge Jordan:

In anticipation of the Rule 16 teleconference in the above action, the parties respectfully propose the following schedule and procedures for the Court's consideration:

Deadline for Joinder/Amendments	June 1, 2005
Deposition Hours	40 per side
Interim Status Report	August 24, 2005
Discovery Status Conference	August 31, 2005
Discovery Cut-off	October 7, 2005
Case Dispositive Motions	October 15, 2005
Answering Briefs on Case Dispositive Motions	November 21, 2005
Reply Briefs on Case Dispositive Motions	December 5, 2005
Final Pretrial Order	March 22, 2006
Pretrial Conference	April 4, 2006
Trial (8 days), 24 hours per side	April 24, 2006

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For the Court's convenience, we have incorporated the above dates into the attached form of Scheduling Order (with the exception of those dates that impact the Court's calendar, which we have left blank). The parties look forward to discussing their proposed schedule with the Court at the Rule 16 Conference.

Respectfully,

/s/ John G. Day

John G. Day

JGD/nml
155836.1

c: Francis X. Pileggi, (via ECF File and Serve; w/attachment)
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